



5. Answering the allegations in Paragraph 5 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

#### **JURISDICTION AND VENUE**

6. Answering the allegations in Paragraph 6 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

7. Answering the allegations in Paragraph 7 of Plaintiff's Complaint, this case was transferred to the Eastern District of Virginia pursuant to an order issued by Judge Amy Berman Jackson of the United States District Court of the District of Columbia on June 25, 2014. Accordingly, the allegations contained in Paragraph 7 (which are, in any event, legal conclusions) are specifically denied.

#### **PARTIES AND JURISDICTION**

8. Answering the allegations in Paragraph 8 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

9. Answering the allegations of Paragraph 9 of Plaintiff's Complaint, Defendants admits those allegations.

10. Answering the allegations in Paragraph 10 of Plaintiff's Complaint, Defendants admit that Farah Atassi is an adult resident of the Commonwealth of Virginia.

11. Answering the allegations in Paragraph 11 of Plaintiff's Complaint, Defendants admit the allegations.

12. Answering the allegations in Paragraph 12 of Plaintiff's Complaint, Defendants admit the allegations.

13. Answering the allegations in Paragraph 13 of Plaintiff's Complaint, Defendants admit the allegations.

14. Answering the allegations in Paragraph 14 of Plaintiff's Complaint, Defendants admit that Farah Atassi is a member of American Arab Communications & Translations Center, LLC t/a/ Zenobia Lounge. Each and every remaining allegation in Paragraph 14 contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies such allegations.

15. Answering the allegations in Paragraph 15 of Plaintiff's Complaint, Defendants admit that Charif Khanji is a member of American Arab Communications & Translations Center, LLC t/a/ Zenobia Lounge. Each and every remaining allegation in Paragraph 15 contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies such allegations.

16. Answering the allegations in Paragraph 16 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

17. Answering the allegations in Paragraph 17 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

18. Answering the allegations in Paragraph 18 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

19. Answering the allegations in Paragraph 19 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

20. Answering the allegations in Paragraph 20 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

21. Answering the allegations in Paragraph 21 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

22. Answering the allegations in Paragraph 22 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

23. Answering the allegations in Paragraph 23 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

24. Answering the allegations in Paragraph 24 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

25. Answering the allegations in Paragraph 25 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

26. Answering the allegations in Paragraph 26 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

27. Answering the allegations in Paragraph 27 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

### **FACTUAL ALLEGATIONS**

28. Answering the allegations in Paragraph 28 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

29. Answering the allegations in Paragraph 29 of Plaintiff's Complaint<sup>1</sup>, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

30. Answering the allegations in Paragraph 30 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

31. Answering the allegations in Paragraph 31 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

32. Answering the allegations in Paragraph 32 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

33. Answering the allegations in Paragraph 33 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

34. Answering the allegations in Paragraph 34 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

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<sup>1</sup> Upon information and belief, the woman identified to Maysaroh is Nura Ziadeh. On March 18, 2013, Ms. Ziadeh plead guilty to five criminal counts which charged her with violations of 8 U.S.C. § 1324(a)(1)(A)(iii) and Title 18 U.S. Code, Section 2, Harboring illegal aliens. Ms. Ziadeh is awaiting sentencing as of the filing of this Complaint.

35. Answering the allegations in Paragraph 35 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

36. Answering the allegations in Paragraph 36 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

37. Answering the allegations in Paragraph 37 of Plaintiff's Complaint, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 37, and on that basis denies the allegations.

38. Answering the allegations in Paragraph 38 of Plaintiff's Complaint, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 38, and on that basis denies the allegations.

39. Answering the allegations in Paragraph 39 of Plaintiff's Complaint, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 39, and on that basis denies the allegations.

40. Answering the allegations in Paragraph 40 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

41. Answering the allegations in Paragraph 41 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

42. Answering the allegations in Paragraph 42 of Plaintiff's Complaint, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 42, and on that basis denies the allegations.

43. Answering the allegations in Paragraph 43 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

44. Answering the allegations in Paragraph 44 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

45. Answering the allegations in Paragraph 45 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

46. Answering the allegations in Paragraph 46 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

47. Answering the allegations in Paragraph 47 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

48. Answering the allegations in Paragraph 48 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

49. Answering the allegations in Paragraph 49 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

50. Answering the allegations in Paragraph 50 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

51. Answering the allegations in Paragraph 51 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

52. Answering the allegations in Paragraph 52 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

53. Answering the allegations in Paragraph 53 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

54. Answering the allegations in Paragraph 54 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

55. Answering the allegations in Paragraph 55 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

56. Answering the allegations in Paragraph 56 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

57. Answering the allegations in Paragraph 57 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

58. Answering the allegations in Paragraph 58 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

59. Answering the allegations in Paragraph 59 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

60. Answering the allegations in Paragraph 60 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

61. Answering the allegations in Paragraph 61 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

62. Answering the allegations in Paragraph 62 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

63. Answering the allegations in Paragraph 63 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

64. Answering the allegations in Paragraph 64 of Plaintiff's Complaint, Defendants admit that Zenobia Lounge is located at 1025 31st Street, NW, Washington, D.C. 20007.

65. Answering the allegations in Paragraph 12 of Plaintiff's Complaint, Defendants admit the allegations.



66. Answering the allegations in Paragraph 66 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

67. Answering the allegations in Paragraph 67 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

68. Answering the allegations in Paragraph 68 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

69. Answering the allegations in Paragraph 69 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

70. Answering the allegations in Paragraph 70 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

71. Answering the allegations in Paragraph 71 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

72. Answering the allegations in Paragraph 72 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

73. Answering the allegations in Paragraph 73 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

74. Answering the allegations in Paragraph 74 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

75. Answering the allegations in Paragraph 75 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

76. Answering the allegations in Paragraph 76 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

77. Answering the allegations in Paragraph 77 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

78. Answering the allegations in Paragraph 78 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

79. Answering the allegations in Paragraph 79 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

80. Answering the allegations in Paragraph 80 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

81. Answering the allegations in Paragraph 81 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

82. Answering the allegations in Paragraph 82 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

83. Answering the allegations in Paragraph 83 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

84. Answering the allegations in Paragraph 84 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

85. Answering the allegations in Paragraph 85 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

86. Answering the allegations in Paragraph 86 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

87. Answering the allegations in Paragraph 87 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

88. Answering the allegations in Paragraph 88 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

89. Answering the allegations in Paragraph 89 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

90. Answering the allegations in Paragraph 90 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

91. Answering the allegations in Paragraph 91 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

92. Answering the allegations in Paragraph 92 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

93. Answering the allegations in Paragraph 93 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

94. Answering the allegations in Paragraph 94 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

95. Answering the allegations in Paragraph 95 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

96. Answering the allegations in Paragraph 96 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

97. Answering the allegations in Paragraph 97 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

98. Answering the allegations in Paragraph 98 of Plaintiff's Complaint, Defendants deny such allegations.

99. Answering the allegations in Paragraph 99 of Plaintiff's Complaint, Defendants deny such allegations.

100. Answering the allegations in Paragraph 100 of Plaintiff's Complaint, Defendants deny such allegations.

101. Answering the allegations in Paragraph 101 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

102. Answering the allegations in Paragraph 102 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

103. Answering the allegations in Paragraph 103 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

104. Answering the allegations in Paragraph 104 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

105. Answering the allegations in Paragraph 105 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

106. Answering the allegations in Paragraph 106 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

107. Answering the allegations in Paragraph 107 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

108. Answering the allegations in Paragraph 108 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

109. Answering the allegations in Paragraph 109 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

110. Answering the allegations in Paragraph 110 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

111. Answering the allegations in Paragraph 111 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

112. Answering the allegations in Paragraph 112 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

113. Answering the allegations in Paragraph 113 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

114. Answering the allegations in Paragraph 114 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

115. Answering the allegations in Paragraph 115 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

116. Answering the allegations in Paragraph 116 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

117. Answering the allegations in Paragraph 117 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

118. Answering the allegations in Paragraph 118 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

119. Answering the allegations in Paragraph 119 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

120. Answering the allegations in Paragraph 120 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

121. Answering the allegations in Paragraph 121 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

122. Answering the allegations in Paragraph 122 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

123. Answering the allegations in Paragraph 123 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

124. Answering the allegations in Paragraph 124 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

125. Answering the allegations in Paragraph 125 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

126. Answering the allegations in Paragraph 126 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations

127. Answering the allegations in Paragraph 127 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

128. Answering the allegations in Paragraph 128 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

129. Answering the allegations in Paragraph 129 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

130. Answering the allegations in Paragraph 130 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

131. Answering the allegations in Paragraph 131 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof. Any implication that Plaintiff was being held against her will is specifically denied.

132. Answering the allegations in Paragraph 132 of Plaintiff's Complaint, Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis deny the allegations and demand strict proof thereof.

133. Answering the allegations in Paragraph 133 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

**FIRST CLAIM FOR RELIEF**

**Trafficking with Respect to Peonage in Furtherance of Trafficking, Peonage, Slavery,  
Involuntary Servitude, or Forced Labor in Violation of 18 U.S.C. § 1592  
(Against Defendants Farah Atassi and Charif Khanji)**

134. Defendants incorporate paragraphs 1 through 133 above as though fully set forth herein.

135. Answering the allegations in Paragraph 135 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

136. Answering the allegations in Paragraph 136 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

137. Answering the allegations in Paragraph 137 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

138. Answering the allegations in Paragraph 138 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

**SECOND CLAIM FOR RELIEF**

**Forced Labor in Violation of 18 U.S.C. § 1589  
(Against All Defendants)**

139. Defendants incorporate paragraphs 1 through 138 above as though fully set forth herein.

140. Answering the allegations in Paragraph 140 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

141. Answering the allegations in Paragraph 141 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

142. Answering the allegations in Paragraph 142 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.



143. Answering the allegations in Paragraph 143 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

144. Answering the allegations in Paragraph 144 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

145. Answering the allegations in Paragraph 145 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

146. Answering the allegations in Paragraph 146 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

147. Answering the allegations in Paragraph 147 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

148. Answering the allegations in Paragraph 148 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

### **THIRD CLAIM FOR RELIEF**

#### **Unlawful Conduct with Respect to Documents in Furtherance of Trafficking, Peonage, Slavery, Involuntary Servitude, or Forced Labor in Violation of 18 U.S.C. § 1592 (Against Defendants Farah Atassi and Charif Khanji)**

149. Defendants incorporate paragraphs 1 through 148 above as though fully set forth herein.

150. Answering the allegations in Paragraph 150 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

151. Answering the allegations in Paragraph 151 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

152. Answering the allegations in Paragraph 152 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

**FOURTH CLAIM FOR RELIEF**

**Failure to Pay Minimum Wages and/or Overtime Wages Under the Fair Labor Standards Act  
(Against All Defendants)**

153. Defendants incorporate paragraphs 1 through 152 above as though fully set forth herein.

154. Answering the allegations in Paragraph 154 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

155. Answering the allegations in Paragraph 155 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

156. Answering the allegations in Paragraph 156 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

157. Answering the allegations in Paragraph 157 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

158. Answering the allegations in Paragraph 158 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies such allegations.

159. Answering the allegations in Paragraph 159 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies such allegations.

160. Answering the allegations in Paragraph 160 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies such allegations.

**FIFTH CLAIM FOR RELIEF**

**Failure to Pay Minimum Wages and/or Overtime Wages Under the District of Columbia  
Minimum Wage Act  
(Against All Defendants)**

161. Defendants incorporate paragraphs 1 through 160 above as though fully set forth herein.

162. Answering the allegations in Paragraph 162 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

163. Answering the allegations in Paragraph 163 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

164. Answering the allegations in Paragraph 164 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

165. Answering the allegations in Paragraph 165 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

166. Answering the allegations in Paragraph 166 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

167. Answering the allegations in Paragraph 167 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

168. Answering the allegations in Paragraph 168 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

169. Answering the allegations in Paragraph 169 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

170. Answering the allegations in Paragraph 170 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

#### **SIXTH CLAIM FOR RELIEF**

##### **False Imprisonment (Against All Defendants)**

171. Defendants incorporate paragraphs 1 through 170 above as though fully set forth herein.

172. Answering the allegations in Paragraph 172 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

173. Answering the allegations in Paragraph 173 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

174. Answering the allegations in Paragraph 174 of Plaintiff's Complaint, this paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Defendants deny such allegations.

175. Answering the allegations in Paragraph 175 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

176. Answering the allegations in Paragraph 176 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

177. Answering the allegations in Paragraph 177 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

178. Answering the allegations in Paragraph 178 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

179. Answering the allegations in Paragraph 179 of Plaintiff's Complaint, Defendants deny each and every allegation contained therein.

#### **PRAYER FOR RELIEF**

180. Answering the allegations in Paragraph 180 of Plaintiff's Complaint, Defendant denies that Plaintiff is entitled to the relief set forth therein.

#### **AFFIRMATIVE DEFENSES**

1. Plaintiff's claims against Defendants are barred by the applicable statutes of limitation.

2. Plaintiff's Complaint fails to state a claim against Defendants upon which relief may be granted.

3. Plaintiff has no standing or capacity to bring some or all of the claims raised in this suit.

4. Plaintiff's claims against Defendants are barred, in whole or in part, by the doctrines of laches and estoppel.

5. Plaintiff's claims against Defendants are barred by the doctrine of unclean hands and Plaintiff's own misconduct.

6. Plaintiff's claims are barred due to the failure of various conditions precedent and conditions subsequent.

7. Plaintiff's claims against Defendants are barred and/or recovery is limited or excluded by the doctrine of illegality.

8. Plaintiff's claims against Defendants are barred, in whole or in part, due to her failure to joint indispensable parties.

9. Plaintiff's Complaint fails to allege facts or a cause of action against Defendants sufficient to support a claim for service charges, attorneys' fees and/or legal fees, or any other relief.

10. Plaintiff's claims are barred because Plaintiff expressly or impliedly consented to Defendants' actions, if any.

11. Plaintiff's claims for damages are barred or limited to the extent that she failed and refused to take any steps to mitigate her alleged damages.

12. Plaintiff's claims for damages are barred or limited to the extent that those damages are not proximately caused by an act or omission on the part of the Defendants.

13. Unless expressly admitted herein, each and every allegation of Plaintiff's Complaint is DENIED.

14. Defendants reserve the right to amend this Answer and assert additional defenses and to supplement, alter, or change their answer and defenses upon the revelation of more definite facts or upon the undertaking of discovery and investigation of this matter.

WHEREFORE, Defendants ask that judgment be entered in their favor in all claims in the Complaint and against Plaintiff Maysaroh, and that Defendants be awarded all costs associated with defense, including reasonable attorneys' fees, and for such further relief as the Court deems just and appropriate.

August 8, 2014

Respectfully submitted,

KALBIAN HAGERTY LLP

/s/ Haig V. Kalbian

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*Counsel for Defendants Farah Atassi, Ahmad Atassi, Charif Khanji, and American Arab Communications & Translations Center, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of August, 2014, I have electronically filed the Answer of Defendants Farah Atassi and Charif Khanji with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Shannon C. Leary, Esq.  
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/s/ Haig V. Kalbian  
Haig V. Kalbian